

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JOAQUIN FRANQUI III, Administrator of the Estate  
of JACK FRANQUI IV,

Plaintiff,

-against-

THE COUNTY OF SUFFOLK, SUFFOLK COUNTY  
POLICE DEPARTMENT, POLICE OFFICER  
KAREN GREINIA, POLICE OFFICERS JOHN AND  
JANE DOES 1-10,

Defendants.

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**RESPONSE TO  
PLAINTIFF'S FIRST  
REQUEST FOR THE  
PRODUCTION OF  
DOCUMENTS AND  
THINGS**

**CV13-5943**

**(JS)(WDW)**

Defendants, the County of Suffolk, Suffolk County Police Department and Police Officer Karen Greinia, hereby respond as follows to Plaintiff's First Request For the Production of Documents and Things:

1a) Objection on grounds of New York Civil Rights Law §50-a, relevance and materiality. Notwithstanding the forgoing objections, and while fully preserving same, a copy of the Internal Affairs Bureau report will be produced upon its completion, pursuant to a stipulated order of confidentiality.

1b) To be provided.

1c) To be provided.

1d) To be provided.

1e) To be provided.

1f) To be provided.

1g) See annexed documents.

1h) See annexed documents.

1i) See annexed documents.

1j) See annexed documents.

1k) Not a document demand

1l) Objection on grounds of New York Civil Rights Law §50-a, relevance and materiality. Notwithstanding the forgoing objections, and while fully preserving same, a copy of the Internal Affairs Bureau report will be produced upon its completion, pursuant to a stipulated order of confidentiality.

1m) Objection on grounds of New York Civil Rights Law §50-a, relevance and materiality. Notwithstanding the forgoing objections, and while fully preserving same, a copy of the Internal Affairs Bureau report will be produced upon its completion, pursuant to a stipulated order of confidentiality.

1n) Objection on grounds of New York Civil Rights Law §50-a, relevance and materiality. Notwithstanding the forgoing objections, and while fully preserving same, a copy of the Internal Affairs Bureau report will be produced upon its completion, pursuant to a stipulated order of confidentiality.

1o) Objection on grounds of New York Civil Rights Law §50-a, relevance and materiality. Notwithstanding the forgoing objections, and while fully preserving same, a copy of

the Internal Affairs Bureau report will be produced upon its completion, pursuant to a stipulated order of confidentiality.

- 1p) To be provided.
- 1q) See annexed documents.
- 1r) Objection on grounds of law enforcement privilege, relevance and materiality.
- 1s) To be provided.
- 1t) To be provided.
- 1u) Objection on grounds of relevance and materiality.
- 1v) Objection on grounds of relevance and materiality.
- 2) Not applicable.
- 3) Objection on grounds of law enforcement privilege, relevance and materiality.

The Suffolk County District Attorney is not a party to this action.

- 4) On information and belief, none exist.
- 5) Objection on rounds of relevance, materiality and redundancy.
- 6) On information and belief, none exist.
- 7) See annexed documents.
- 8) To be provided.

- 9) Objection on grounds of relevance and materiality.
- 10) Objection on grounds of law enforcement privilege, relevance and materiality.
- 11a) To be provided.
- 11b) To be provided.
- 11c) Objection on grounds of relevance and materiality.
- 11d) To be provided.
- 11e) To be provided.
- 11f) To be provided.
- 11g) Objection on grounds of relevance and materiality.
- 11h) Objection on grounds of relevance and materiality.
- 11i) Objection on grounds of relevance and materiality.
- 11j) Objection on grounds of relevance and materiality.
- 11k) Objection on grounds of relevance and materiality.
- 11l) Objection on grounds of relevance and materiality.
- 11m) Objection on grounds of relevance and materiality.

11n) To be provided.

11o) To be provided.

11p) To be provided.

11q) To be provided.

11r) Objection on grounds of relevance and materiality.

11s) Objection on grounds of relevance and materiality.

11t) To be provided.

11u) Objection on grounds of relevance and materiality.

11v) Objection on grounds of relevance and materiality.

11w) To be provided.

11x) Objection on grounds of relevance and materiality.

11y) Demand is incomprehensible.

12) On information and belief, none exist.

13) Objection on grounds of New York Civil Rights Law §50-a, relevance, materiality and overbreadth. Notwithstanding the forgoing objections, and while fully preserving same, a copy of defendant Grenia's personnel records will be produced pursuant to stipulated order of confidentiality.

14) Objection on grounds of New York Civil Rights Law §50-a, relevance, materiality and overbreadth. Notwithstanding the forgoing objections, and while fully preserving same, a copy of defendant Grenia's personnel records will be produced pursuant to stipulated order of confidentiality.

15) Objection on grounds of New York Civil Rights Law §50-a, relevance, materiality and overbreadth. Notwithstanding the forgoing objections, and while fully preserving same, a copy of defendant Grenia's personnel records will be produced pursuant to stipulated order of confidentiality.

16) Objection on grounds of New York Civil Rights Law §50-a, relevance and materiality. Notwithstanding the forgoing objections, and while fully preserving same, a copy of the Internal Affairs Bureau report will be produced upon its completion.

17) Objection on grounds of harassment, invasion of privacy, relevance and materiality. Not a document demand.

18) Objection on grounds of New York Civil Rights Law §50-a, relevance, materiality and redundancy. Notwithstanding the forgoing objections, and while fully preserving same, a copy of defendant Grenia's personnel records will be produced pursuant to stipulated order of confidentiality.

19) See annexed documents.

20) Objection on grounds of relevance and materiality.

21) On information and belief, none exist.

22) On information and belief, none exist.



23) Objection on grounds of New York Civil Rights Law §50-a, relevance, materiality and overbreadth.

24) On information and belief, none exist at this time.

25) On information and belief, none exist at this time.

Dated: Hauppauge, New York  
March 19, 2014

Yours etc.,  
Dennis M. Brown  
Suffolk County Attorney  
Attorney for Defendants  
County of Suffolk, Suffolk County  
Police Department and P.O. Grenia  
H. Lee Dennison Building  
100 Veterans Memorial Highway  
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By:

  
Arlene S. Zwilling  
Assistant County Attorney

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